

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

5:16-CR-320

STACEY J. LAPORTE, JR.,

Defendant.

SECOND SUPERSEDING INDICTMENT

June 12, 2017
Utica, New York

Court's Exhibit No. 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	Criminal No.	5:16-CR-320 (DNH)
)		
v.)	Second Superseding Indictment	
)		
STACEY J. LAPORTE, JR.)	Violations:	18 U.S.C. § 2251(a) and (e)
)		[Conspiracy to Sexually
)		Exploit a Child]
)		
)		18 U.S.C. § 2251(a)
)		[Sexual Exploitation of
)		Children]
)		
)		18 U.S.C. § 2252A(a)(2)(A)
)		[Receipt of Child
)		Pornography]
)		
)	6 Counts .	
)		
Defendant.)	County of Offense:	St. Lawrence

THE GRAND JURY CHARGES:

COUNT 1
[Conspiracy to Sexually Exploit a Child]

From in or about 2014 through in or about May, 2016, in St. Lawrence County in the Northern District of New York, defendant **STACEY J. LAPORTE, JR.** conspired with Mackenzie Bailey to use V-1, a minor female child born in 2014 whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, and where the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and where such visual depictions were actually transported and

transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, in violation of Title 18 United States Code, Sections 2251(a) & (e).

COUNT 2
[Conspiracy to Sexually Exploit a Child]

From in or about April through June, 2015, in St. Lawrence County in the Northern District of New York, defendant **STACEY J. LAPORTE, JR.** conspired with Hillary Trimm to use V-4, a minor female child born in 2014 whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, and where the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and where such visual depictions were actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, in violation of Title 18 United States Code, Sections 2251(a) & (e).

COUNTS 3 - 4
[Sexual Exploitation of a Child]

On or about the dates listed below, in St. Lawrence County, in the Northern District of New York, defendant **STACEY J. LAPORTE, JR.**, acting with Mackenzie Bailey, did use V-1, a minor female child born in 2014 whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, and where the visual depictions were produced using materials that had been mailed, shipped, and

transported in and affecting interstate and foreign commerce by any means, including by computer, and where such visual depictions were actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, in violation of Title 18, United States Code, Sections 2251(a) & (e), and 2(a).

Count	Date
3	March 2, 2016
4	March 3, 2016

COUNT 5
[Sexual Exploitation of Children]

On or about February 28, 2016, in St. Lawrence County, in the Northern District of New York, defendant **STACEY J. LAPORTE, JR.** did use, persuade, induce, entice, and coerce V-2, a male child born in 2003, and V-3, a female child born in 1999, whose identities are known to the grand jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, and where the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and where such visual depictions were actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce, in violation of Title 18, United States Code, Sections 2251(a) & (e).

COUNT 6
[Receipt Of Child Pornography]

On or about March 25, 2016, in St. Lawrence County in the Northern District of New York, the defendant, **STACEY J. LAPORTE, JR.**, did knowingly receive child pornography using a means and facility of interstate and foreign commerce, shipped and transported in and affecting

such commerce by any means, including by computer, in that the defendant did receive, by way of the Internet and/or a cellular network, graphic image files depicting one or more minors engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

Dated: April 20, 2017

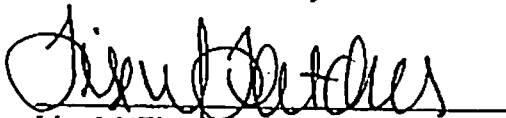
A TRUE BILL,



Grand Jury Foreperson

RICHARD S. HARTUNIAN
United States Attorney

By:



Lisa M. Fletcher
Assistant United States Attorney
Bar Roll No. 510186